

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

---

In re:

Todd A. Brunner and  
Sharon Y. Brunner,

Case No. 11-29064  
Chapter 11

Debtors.

---

OBJECTION TO THE MOTION FOR RELIEF FROM AUTOMATIC STAY AND FOR  
ABANDONMENT OF PROPERTY OF  
WOODLANDS CONDOMINIUM HOMEOWNERS ASSOCIATION, INC.

---

Debtors hereby object to the Motion of the Woodlands Condominium Homeowners Association, Inc. for Relief from Automatic Stay and for Abandonment of Property and allege and show to the Court as grounds therefore:

1. There is substantial equity in the property that is the subject of the Motion, over and above property taxes and condo fees as there is not a mortgage affecting this property.

Dated this 19<sup>th</sup> day of September, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN  
Attorneys for Debtors

/s/ Jonathan V. Goodman  
Jonathan V. Goodman

Law Offices of Jonathan V. Goodman  
788 North Jefferson Street - Suite 707  
Milwaukee, WI 53202-3739  
Phone: (414) 276-6760 - Fax: (414) 287-1199  
E-mail: [jgoodman@ameritech.net](mailto:jgoodman@ameritech.net)